

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEREMY LEVIN and DR. LUCILLE LEVIN,

Plaintiffs,

-v-

THE BANK OF NEW YORK MELLON,
JPMORGAN CHASE & CO., JPMORGAN
CHASE BANK, N.A., SOCIÉTÉ
GÉNÉRALE, and CITIBANK, N.A.

Defendants.

THE BANK OF NEW YORK MELLON,
JPMORGAN CHASE & CO., JPMORGAN
CHASE BANK, N.A., SOCIÉTÉ
GÉNÉRALE, and CITIBANK, N.A.

Third-Party Plaintiffs,

-v-

STEVEN M. GREENBAUM, *et al.*

Third-Party Defendants.

(FILED PARTIALLY UNDER SEAL
DUE TO CONFIDENTIAL
INFORMATION SUBJECT TO
PROTECTIVE ORDER)

Civ. No. 09 CV 5900 (RPP) (MHD)

**DECLARATION OF JAMES M.
DORSEY IN SUPPORT OF
JUDGMENT CREDITORS'
RENEWED JOINT MOTION FOR
PARTIAL SUMMARY JUDGMENT
ON SINGLE PHASE TWO ASSET**

DECLARATION OF JAMES M. DORSEY

I, James M. Dorsey, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, declare:

1. I am an adult citizen of the Federal Republic of Germany and a resident of the Republic of Singapore.

2. I am a Senior Fellow at the S. Rajaratnam School of International Studies of Nanyang Technological University in Singapore where I am the school's resident Middle East expert and co-director of the Institute of Fan Culture of the University of Wuerzburg in Germany. I am also the author of the widely acclaimed blog, The Turbulent World of Middle East Soccer, and a forthcoming book with the same title to be published by Oxford University Press. My previous positions include four decades covering the Middle East, including the Islamic Republic of Iran ("Iran"), as a foreign correspondent for, among others, The Wall Street Journal, The New York Times, Financial Times, The Christian Science Monitor, NBC News, ABC News and United Press International. Iran-related events that I have covered include the 1979 Iranian revolution, the 1979 US hostage crisis, 1980-88 Iran-Iraq war, Iran's relationship with Syria and the Lebanese militia Hezbollah, Iranian-Gulf relations and the Iranian nuclear crisis.

3. As a foreign correspondent, I first visited Iran in 1976 and have visited it frequently since. My last visit was in March 2013. I was based in Iran as a foreign correspondent from 1978 until 1981. As part of my work on Middle Eastern soccer, I regularly publish about Iran and discuss Iranian soccer issues with executives of the Fédération Internationale de Football Association ("FIFA") [REDACTED]

[REDACTED]

4. I have done contract consulting work about the Middle East, including Iran, for international banks, such as Chase Manhattan Bank and JP Morgan, and have briefed agencies of the governments of Britain, France, The Netherlands, Singapore and Thailand. These consultations and briefings focused on the domestic and foreign policies

of Iran as well as allegations of Iranian support for terrorism. I have furthermore been an advisor to Chairman Klaus Schwab of the World Economic Forum (“WEF”) on the initial Middle East and North Africa summits in the 1990s in Casablanca, Amman, Cairo and Doha and have regularly chaired panels at WEF Middle East and North Africa, Turkey and Africa summits.

5. I frequently give public lectures at universities in the United States, Europe, Asia, the Middle East and North Africa and Latin America and conferences across the globe, including conferences sponsored by the Iranian Foreign Ministry's Institute for Political and International Studies in Tehran, as well as conferences sponsored by the foreign ministries of France, Singapore and Thailand that partially focus on the politics of Iranian soccer. My forthcoming book on soccer in the Middle East has a substantial section on Iran.

6. I am the author of numerous publications about the Middle East and, in particular, about the sport of soccer in the Middle East, including some 13 books and book chapters, 28 articles in academic and policy journals, and 65 academic briefs. A list of my publications on these subjects is attached as Exhibit A. I have been writing about the Middle East, including Iran, since 1972. I have been based as a foreign correspondent covering the region in Tehran, Jerusalem, Beirut, Cairo, Kuwait, Dubai, Riyadh, Larnaca, Ankara, Istanbul, Athens, Paris, Amsterdam, London and Washington. I am regularly invited to comment on Middle Eastern issues by broadcasters such as CNN, the BBC, Al Jazeera, France 24, and Central News Asia. As a scholar based in Singapore, I travel to the Middle East at least once a month. My scholarly and policy work has been published by journals such as The International Journal of the History of Sport, Mobilization, the Journal of Levantine Studies, Foreign Policy, Global Brief and by the Middle East Institute in Singapore and the S. Rajaratnam School of International Studies. I have further been published by The Wall Street Journal, The New York Times, the Christian Science Monitor, Financial Times, Bloomberg, Time, Le Monde Diplomatique, Trouw, De Tijd, De Haagse Post, and De Groene Amsterdammer. I have also been a correspondent in the Middle East for NBC News, ABC News, and Dutch and Belgian

radio and television and have contributed to PBS. My blog, The Turbulent World of Middle East Soccer, is widely read and quoted and syndicated as a column in, among others, The Huffington Post, Hurriyet Daily News, Eurasia Review, Daily News, Harry's Place, Aslan Media, The Daily Journalist, All Africa, I-sportConnect, FootballSpeak, Sport & Development, Global Defence, Your Middle East, MidEastPosts, Middle East Online, HotnHitNews, Fair Observer, Muftah, Cleatbeat, Keir Radnedge, SoccerBlogs, The Kathmandu Post, The Nation (Bangkok), The Korea Post, The Straits Times (Singapore), Play the Game, Boxscore, Make Us Dream, World Security Network, Albany Tribune News, Sportcal, and Middle East Institute@New Delhi. The blog is part of course syllabi in numerous universities, including Emory University, The New School (New York), University of Michigan, the University of North Carolina, and the University of California (Irvine).

7. I have won awards, including the Dolf van den Broek Prize in 2003, and been nominated for the Pulitzer Prize twice in 1981 and 1988, the Kurt Schork Award in 2002, the Amnesty International Media Award 2002, Index on Censorship 2013 Award, and I was a finalist for the European Press Award in 2013. LSPD in Italy listed me in 2011 among its top 100 Global Thinkers.

8. In addition to English, I speak Arabic, Hebrew, Turkish, Dutch, German and Spanish.

9. As part of my training and professional experience, I am knowledgeable about the politics of sports in general and soccer in particular in the Middle East, including Iran, as well as of the legal, economic and social parameters within which [REDACTED] operate and their relationships with national governments.

10. I have followed since 1972 the scholarly literature and press from and about the Middle East. I have an archive of thousands of news articles from Arabic, Hebrew Iranian, U.S. and European newspapers and periodicals and an extensive library of books related to the Middle East, including Iran, and sports in the region.

11. I have attended tens of academic and scholarly conferences in which Iranian foreign, domestic and sports policy was discussed by leading experts from the United States, Israel, and Arab countries, Iran, Asia and Europe. I have often discussed with these experts Iran's sports policy and the affairs of the [REDACTED].

12. [REDACTED]
[REDACTED]

13. [REDACTED]
[REDACTED]

14. [REDACTED]
[REDACTED]

15. [REDACTED]:
[REDACTED]



16.

[Redacted text]

[Redacted text]

[REDACTED]

17. It is my professional opinion that a majority of [REDACTED] are owned by the Government of Iran or Iranian governmental entities or have other substantial ties to the Government of Iran, and that the Government of Iran has a substantial ownership interest in the [REDACTED].

18. [REDACTED]
[REDACTED]
[REDACTED], it is my professional opinion that the Government of Iran [REDACTED] by directly and indirectly interfering in its internal affairs [REDACTED]
[REDACTED].

19. [REDACTED]

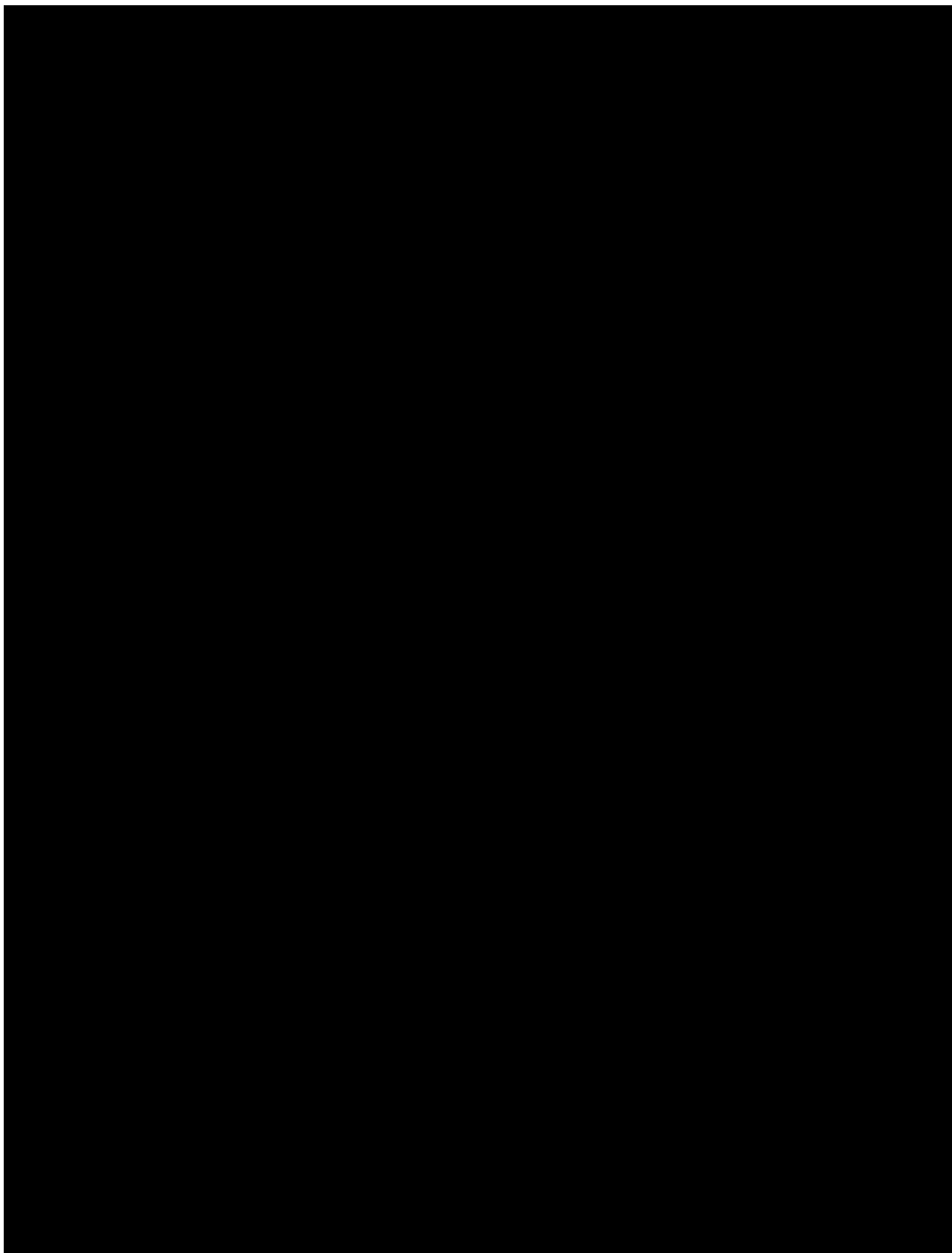
[REDACTED]

20. [REDACTED]

[REDACTED]

21. [REDACTED]

[REDACTED]



22. [REDACTED].

[REDACTED]

23. [REDACTED]

[REDACTED]

24. [REDACTED]

[REDACTED]

[REDACTED]

25. [REDACTED]

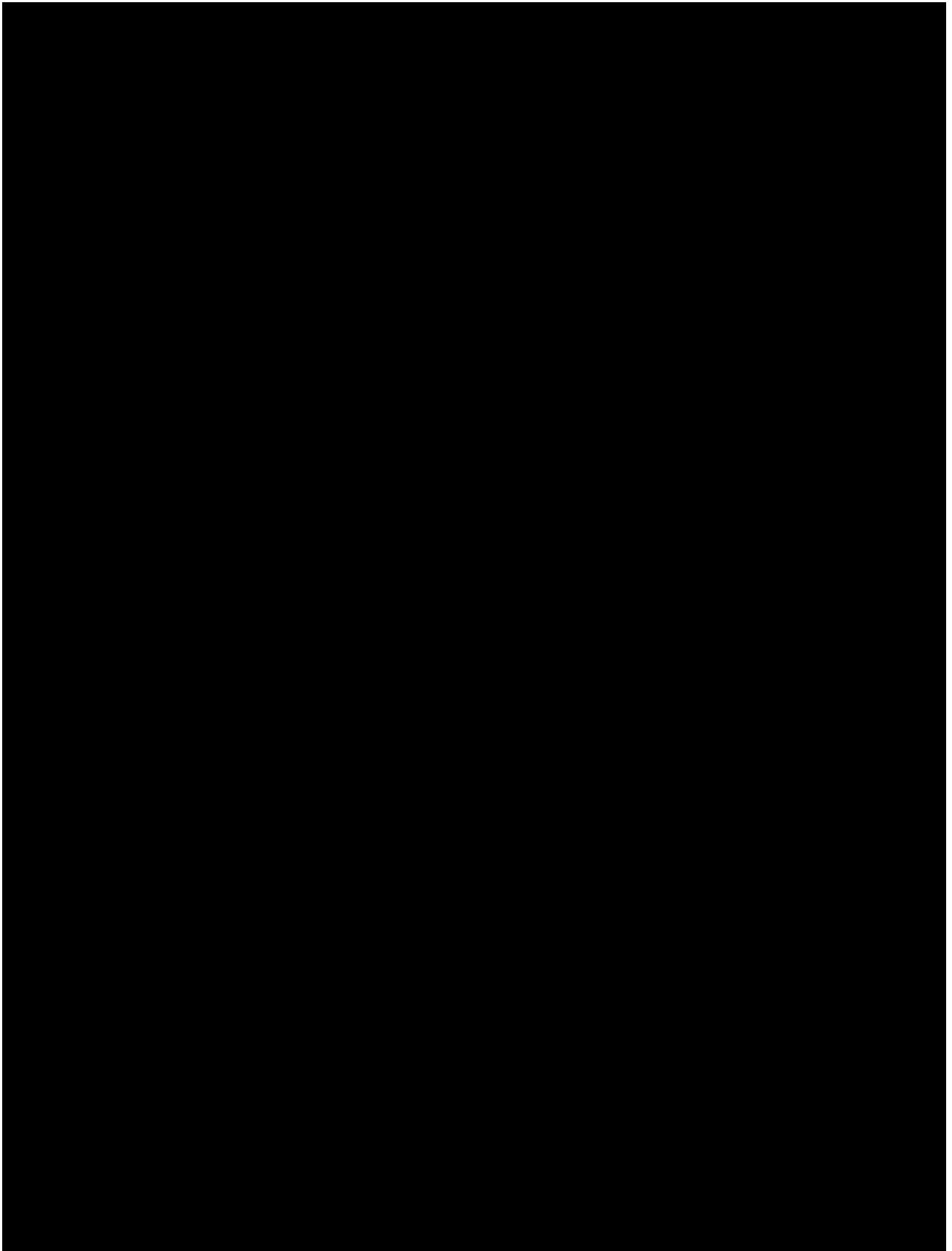
[REDACTED]

26. [REDACTED]

[REDACTED]

27. [REDACTED]

[REDACTED]



[REDACTED]

28.

[REDACTED]

[REDACTED]

[REDACTED]

29.

[REDACTED]

[REDACTED]

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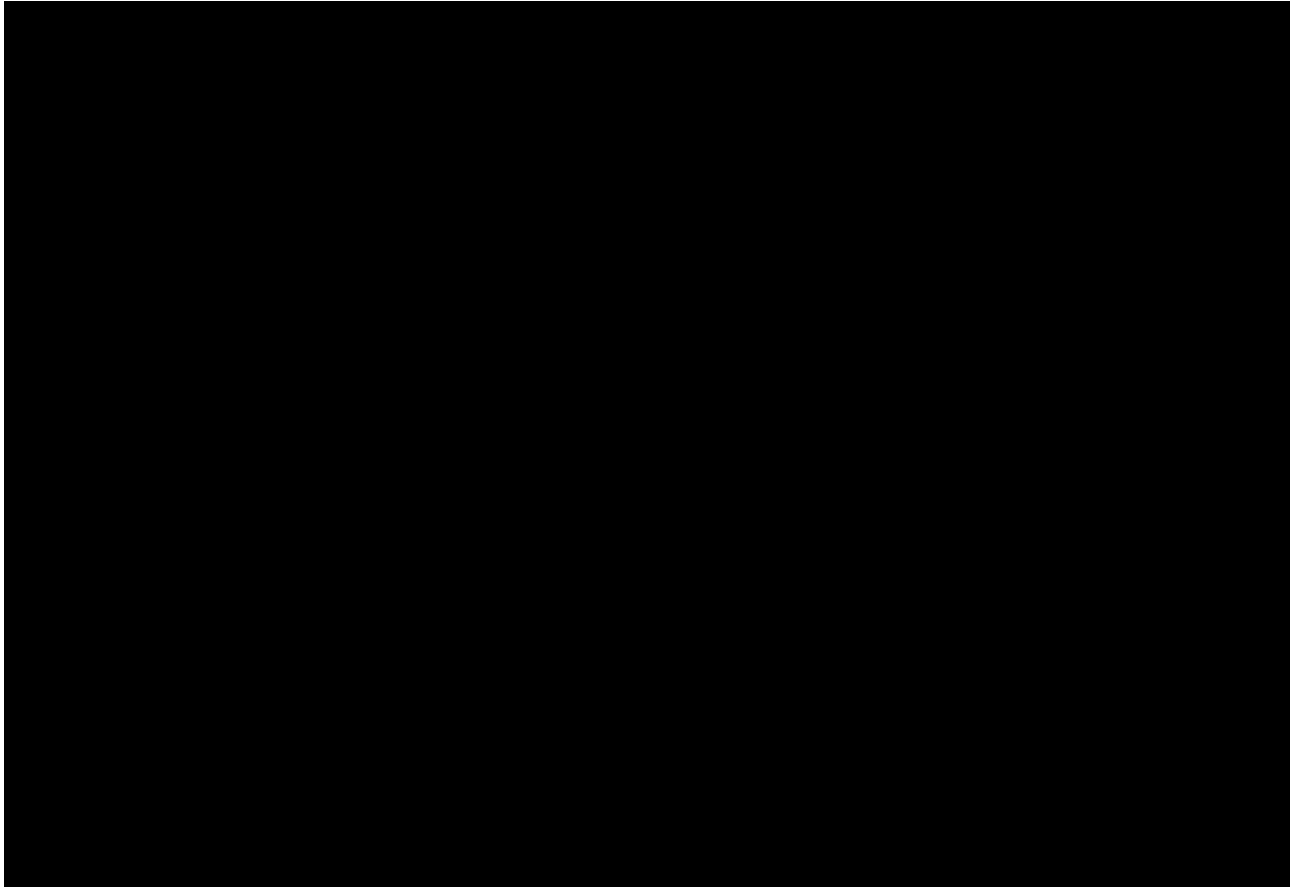
[REDACTED]

[REDACTED]

31.

[REDACTED]

[REDACTED]



I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 1st day of June, 2014 in Singapore.

Handwritten signature of James M. Dorsey.

James M. Dorsey

EXHIBIT A: PUBLICATIONS OF JAMES M. DORSEY

Books:

- **The Turbulent World of Middle East Soccer.** Hurst and Oxford University Press (forthcoming in 2014)
- **The Middle East in Turmoil,** World Scientific, (forthcoming in 2014)
- **Rooted in history: Politics, Identity and Ultras in North African Soccer** in Identity and Nation in African Football: Fans, Community, and Clubs, Brown University Press (forthcoming 2014)
- **The Middle East** in Sport Governance, International Case Studies, Edited by Ian O'Boyle and Trish Bradbury, Routledge, 2013
- **Soccer and Political Protests in MENA Countries,** IE Med Mediterranean Yearbook 2013
- **Soccer: A Middle Eastern and North African Battlefield for Freedom and Dignity** in It's How the Game is Played, Perspectives on the Studies of Sports, Edited by Susan Dun, Mo'tasem Kalaji and Marion Stell, Inter-Disciplinary Press 2013
- **Soccer: A Battle for Middle Eastern and North African Dignity and Freedom,** It's How You Play the Game, Edited by Susan Dun, Mo'tasem Kalaji and Marion Stell, Inter-Disciplinary Net, 2013
- **Soccer – A Middle Eastern and North African Battlefield** – to be published as a chapter in a book published by the Institute of Fan Culture, University of Wuerzburg
- Chapter in **The World After Osama Bin Laden**, edited by Professor Rohan Gunaratna (forthcoming)
- Chapter on **Saudi charities**, edited by Robert Lacey and Jonathan Benthall. Gerlach Press (forthcoming)
- Chapter on **Islam and Europe** edited by Jacqueline Lo and Neal Robinson
- **De Octoberoorlog** (on the 1973 Middle East war) – chapter
- **Middle East** section of Spectrum Encyclopedia

Academic and policy journals:

- **'Street, Shrine, Square and Soccer Pitch, Comparative Protest Spaces in Asia and the Middle East**, ASPJ - Africa & Francophonie, 4th Quarter 2013
- **What Role for World Cup in Arab Spring**, Global Brief, November 2013
- **Are private military contractors the way to go?**, Forum on EthnoGeoPolitics, Vol 1:2, Autumn 2013
- **Wahabism vs. Wahabism: Qatar's Challenge to Saudi Arabia**, RSIS Working Paper, September 2013
- **A Decade of Defiance and Dissent, A Wake-Up Call for Sports**, RSIS Policy Brief, August 2013
- **Facing One's Demons: The Egyptian Military and the Brotherhood at a Crossroads**, Middle East Insight, No 98
- **A Region in Turmoil: Threats to Gulf Energy and Shipping**, *Global Brief*, March 2013
- **Football: a sporting barometer of European integration policies**, ICSS Journal, Vol 1:2
- **Reputational risks for global sports bodies**, ICSS Journal, Vol 1:3
- **Egyptian football becomes a test of political fortune**, ICSS Journal, Vol: 1:1
- **Pitched Battles: The Role Of Ultra Soccer Fans In The Arab Spring – Analysis**, *Mobilization* (Tier 1), December 2012
- **The Turbulent World of Middle East Soccer** – Monograph to be published by the S. Rajaratnam School of International Studies, Nanyang Technological University
- **Soccer – A Middle Eastern and North African Battlefield**, *The International Journal of the History of Sport* (forthcoming)
- **Soccer : an engine of identity and anti-autocratic politics**, *Soccer and Society* (forthcoming)
- **The Politics of Soccer in Indonesia and Turkey** (co-authored by Leonard Sebastian), *Soccer and Society*, Soccer & Society, Volume 14, Issue 5, 2013
- **Street, Shrine and Soccer Pitch: Comparative Protest Spaces in Asia and the Middle East** in *Air and Space Power Journal* (forthcoming)
- **A Region in Turmoil: Threats to Gulf Energy and Shipping**, *MEI Insight*, November 2012

- **Turkey: Caught between a rock and a hard place**, *Turkish Review*, Volume 2, March/April 2012
- **Ultra Violence: How Egypt's soccer mobs are threatening the revolution**, *Foreign Policy*, February 2012
- **Soccer – A Middle East and North Africa Battlefield**, *USAK Yearbook of Political and International Relations*, International Strategic Research Organization, Volume 5, 2012
- **Street, Shrine, Square and Soccer Pitch: Comparative Protest Spaces in Asia and the Middle East**, by Teresita Cruz-del Rosario and James M. Dorsey, *RSIS Working Papers* No. 230, November 2011
- **Middle Eastern Responses to Anti-US Protests: Signs of Healthy Change?** *Tel Aviv Notes*, October 2012
- **Winds Blowing East? The Arab Revolt, Social Movements and Civil Society in Southeast Asia**, *Institute Francais des Relation Internationales*, co-authored with Teresita Cruz-Del Rosario, February 2012
- **Rap and Metal on Planet Islam: The booming voice of pent-up Middle Eastern anger**, *Reason*, December 2010
- **Change in the Middle East puts Turkey in the eye of the storm**, *Turkish Policy Quarterly*, Winter 2010
- **Hitting Militants Where It Hurts, Development is the way to fight global terrorism**, *Internationale Politik*, July 2010
- **Letter From Sana'a: On State Failure's Doorstep**, *Foreign Affairs*, February 2010
- **Water Security: Does Europe Have A Strategy?** – Monograph published by *Friends of Europe*, Brussels, 2009

Academic briefs:

- **The Iran Nuclear Deal: Rewriting the Middle East Map**, RSIS Commentaries No. 217/2013, November 2013
- **U.S. Freezing of Military Aid to Egypt: How Much of a Dent?**, RSIS Commentaries No. 195/2013, October 2013
- **US Tightrope Walk: Arab Autocrats Try to Redefine Terrorism**, RSIS Commentaries No. 148/2013, August 2013

- **Egypt's Third Way: A Blend of Islamism and Militarism**, RSIS Commentaries, 144/2013. August 2013
- **The US Bogeyman in Post-coup Egypt**, RSIS Commentaries, 136/2013. July 2013
- **Football: a sporting barometer of European integration policies**, ICSS Journal, Vol 2, No 2
- **The Struggle for Egypt: Saudi Arabia's Regional Role**, RSIS Commentaries, 130/2013. July 2013
- **Egypt on the Brink: The Military's Dilemma**, RSIS Commentaries, 127/2013, July 2013
- **Military Coup in Egypt: A Recipe for Failure**, RSIS Commentaries, 126/2013, July 2013
- **Iran's New President: Averting a Popular Revolt**, RSIS Commentaries, 109/2013, June 2013
- **Syrian Civil War: Russia Forges Risky Ties with Islamists**, RSIS Commentaries, 100/2013, May 2013
- **Reform of Middle Eastern Militaries: Lessons from Indonesia**, RSIS Commentaries, 092/2013, May 2013
- **Resumption of Egyptian Soccer – A Turning Point or Quiet Before the Storm**, ICSS Journal, Vol 1, No 1, March 2013
- **The Shia-Sunni divide: Tunnel vision prevails**, RSIS Commentaries, 067/2013, April 2013
- **Civil war in Syria: The Spillover**, RSIS Commentaries, 040/2013, March 2013
- **Shaky monarchies, strategic pressures, and threats to energy and shipping**, Global Brief, March 2013
- **Post-revolt Arab Transitions: Driven by Distrust and Inexperience**, RSIS Commentaries, 027/2013, January 2013
- **Qatar's Challenge to Saudi Arabia: An alternative view of Wahhabism**, RSIS Commentaries, No. 17/2013, January 2013
- **Middle East and North Africa: Another year of Upheaval**, RSIS Commentaries No. 011/2013, January 2013
- **The issue of Arab Jews: Manipulating a Justified Cause**, RSIS Commentaries No. 202, October 2012

- **Revolt in the Middle East: Arab monarchies next?**, RSIS Commentaries No. 200, October 2012
- **Impact of Anti-US Protests: Healthy Change in the Muslim World** , RSIS Commentaries No. 179, September 2012
- **The Arab Revolts: Impact on Central Asia**, RSIS Commentaries No. 161, August 2012
- **The Arab Spring Revisited: From Mass Protests to Local Revolts** , RSIS Commentaries No. 156, August 2012
- **Conflict in Syria: The Regional Fall-out**, RSIS Commentaries No. 150, August 2012
- **Turkey and Syria: The Kurdish dilemma**, RSIS Commentaries No. 143, August 2012
- **The Syrian Crisis: Russian Policy Risks Wider Conflict**, RSIS Commentaries No. 139, July 2012
- **The Arab world in turmoil: Nasser's legacy reprise** (co-authored by Mushahid Ali, RSIS Commentaries No. 136, July 2012
- **Egypt: Heading for more turbulence**, RSIS Commentaries No. 107, June 2012
- **Syria: Saudi Arabia's policy conundrum**, RSIS Commentaries No. 101, June 2012
- **A sleeping dragon awakes: Kurds Take Centre Stage in West Asia**, RSIS Commentaries No. 99, June 2012
- **Global Sporting Events: Battlegrounds for Human Rights**, RSIS Commentaries No. 89, June 2012
- **The struggle for Syria: Iran-Qatar Ties Come under Stress**, RSIS Commentaries No. 57, April 2012
- **Egypt One Year On: Stark Message for Arab Revolutionaries**, RSIS Commentaries No. 18, January 2012
- **Saudi Arabia embraces Salafism: Countering the Arab uprising?**, RSIS Commentaries No. 9, January 2012
- **Tahrir and Change Squares: Two Models of Subverted Revolts**, RSIS Commentaries No. 187, December 2011
- **Raising the stakes: Russian military support for Syria**, RSIS Commentaries No. 181, December 2011

- **Year of the Arab Uprising: Impact on Southeast Asia**, RSIS Commentaries No. 177, November 2011
- **Stepping up Sanctions: Arab and Turkish Pressures on Syria**, RSIS Commentaries No. 175, November 2011
- **Egypt's Military Council: Between a rock and a hard place**, RSIS Commentaries No. 174, November 2011
- **Syrian Uprising: Arab League acts on Damascus**, RSIS Commentaries No. 167, November 2011
- **Mounting Israeli-Iranian Tension: Turkey in the Middle**, RSIS Commentaries No. 160, November 2011
- **Israel and Hamas: A new equation for Mid-East peace?**, RSIS Commentaries No. 156, October 2011
- **An Arab Development Bank: Institutionalizing Change in Middle East**, RSIS Commentaries No. 145, October 2011
- **Arab Protesters and Social Media: Need for Engagement**, RSIS Commentaries No. 138, October 2011
- **UNSC vote on Palestine State: US Credibility at Stake**, RSIS Commentaries No. 132, September 2011
- **Is Iran Turning its Back on Syria?**, RSIS Commentaries No. 129, September 2011
- **Fall of Gaddafi: Policy challenge for China and Russia**, RSIS Commentaries No. 126, September 2011
- **US and the Middle East: PR fiasco looms for Obama**, RSIS Commentaries No. 123, August 2011
- **Libya at the Crossroads: A MidEast Model or Revolution gone Awry?**, RSIS Commentaries No. 122, August 2011
- **Syria's Widening Protests: Assad increasingly Beleaguered**, RSIS Commentaries No. 118, August 2011
- **Role of Arab militaries in popular uprisings**, RSIS Commentaries No. 111, August 2011
- **Syrian Revolt: Protesters at a Crossroads** (with Zulkifli Mohamed Sultan), RSIS Commentaries No. 109, July 2011
- **Fighting a Lost Battle: Bin Laden's Shoes are too Big to Fill**, Middle East Institute, June 2011

- **Arab Revolt Narrows US Policy Choices**, Brookings Institution, June 2011
- **US-backed Saudi Hostility to Iran likely to Backfire**, Middle East Institute, May 2011
- **Libyan Islamists Stand to Gain with or without Qadhafi**, Middle East Institute, April 2011
- **Oil: a risky beneficiary of Japan's nuclear crisis and Arab revolts**, *Global-is-Asian*, Lee Kuan Yew School of Public Policy. April-June 2011
- **Soccer versus Islam: The Battle for Egypt's Future**, Middle East Institute, March 2011
- **Countering the Impulse to Militarily Support the Libyan Underdog**, Middle East Institute, March 2011
- **Iran Plays on Mounting Tension in Saudi Arabia**, Middle East Institute, March 2011
- **Emboldened Fans Rewrite the Politics of Egyptian Soccer**, Middle East Institute, March 2011
- **Change in the Middle East Puts Turkey in the Eye of the Storm**, Middle East Institute, March 2011
- **Juventus and the Gaddafi Family**, Middle East Institute, March 2011
- **Off the Pitch and On, Egyptians Yearn for Lasting Reforms**, Middle East Institute, March 2011